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5 *Counsel for Defendant Vidal Contreras*

6 **United States District Court**

7 **District of Nevada**

8 MAUREEN GREENSTONE, an individual
 9 and as appointed Guardian of SETH DALE
 GREENSTONE, an Adult Protected
 Person,

10 Plaintiff,

11 LAS VEGAS METROPOLITAN POLICE
 12 DEPARTMENT; VIDAL CONTRERAS;
 and DOES 1–10, inclusive,

13 Defendants.

14 Case No.: 2:23-cv-00290-GMN-NJK

15 **Stipulation and Order to Extend
 Discovery**

16 **(First Request)**

17 Plaintiff Maureen Greenstone, Defendant Las Vegas Metropolitan Police Department
 18 (LVMPD), and Defendant Officer Vidal Contreras (Ofc. Contreras) (together, the parties)
 hereby stipulate to extend the remaining discovery and pretrial deadlines by 60 days. This is
 the parties' first request to extend the deadlines.

19 **I. CURRENT DEADLINES.**

20 The following are the current deadlines:

CURRENT DEADLINE	EVENT
08/28/2023	Deadline for Initial Expert Disclosures
09/27/2023	Deadline for Rebuttal Expert Disclosures
10/25/2023	Close of Discovery
11/24/2023	Deadline for Dispositive Motions

CURRENT DEADLINE	EVENT
12/26/2023	Deadline for the Joint Pretrial Order (the filing of a dispositive motion will suspend the joint pre-trial order deadline until 30 days after a decision on the motion or until otherwise ordered by the court)

II. DISCOVERY CONDUCTED TO DATE.

To date, the parties have exchanged disclosures. Ofc. Contreras has propounded written discovery on Plaintiffs. Ofc. Contreras is in the process of obtaining Seth Greenstone's MRIs, x-rays, and CT scans for analysis by a medical consultant.

III. DESCRIPTION OF THE REMAINING DISCOVERY.

The parties wish to disclose experts, serve additional written discovery and subpoenas duces tecum, and depose additional nonparty witnesses and experts.

IV. REASONS FOR EXTENDING THE DEADLINES.

LR 26-3 states the following, in relevant part:

A motion or stipulation to extend any date set by the discovery plan, scheduling order, or other order must, in addition to satisfying the requirements of LR IA 6-1, be supported by a showing of good cause for the extension. A motion or stipulation to extend a deadline set forth in a discovery plan must be received by the court no later than 21 days before the expiration of the subject deadline. A request made within 21 days of the subject deadline must be supported by a showing of good cause. A request made after the expiration of the subject deadline will not be granted unless the movant also demonstrates that the failure to act was the result of excusable neglect.

The parties wish to extend all deadlines by 60 days because they cannot meet the current initial expert disclosure deadline. The Plaintiffs produced Seth Greenstone's medical records in their initial disclosure of documents and witnesses. A medical consultant retained by the Defendants reviewed the records and recently informed the Defendants that they need copies of Seth's brain imaging, including, without limitation, his MRIs, x-rays, and CT scans. The consultant's medical assessment cannot be completed without these images, and the Defendants need more time to obtain the images before the current initial expert disclosure deadline. The Defendants contacted the Plaintiffs to extend the discovery deadlines immediately after being informed of

1 the need for copies of the brain imaging. The parties have agreed to a 60-day extension.

2 **IV. PROPOSED EXTENDED DEADLINES.**

3 The parties propose extending the deadlines as follows:

4 PROPOSED EXTENDED DEADLINE	5 CURRENT DEADLINE	6 EVENT
7 10/27/2023	8 08/28/2023	Deadline for Initial Expert Disclosures
9 11/27/2023 ¹	10 09/27/2023	Deadline for Rebuttal Expert Disclosures
11 12/26/2023 ²	12 10/25/2023	Close of Discovery
13 01/23/2024	14 11/24/2023	Deadline for Dispositive Motions
15 02/26/2024 ³	16 12/26/2023	Deadline for the Joint Pretrial Order (the filing of a dispositive motion will suspend the joint pre-trial order deadline until 30 days after a decision on the motion or until otherwise ordered by the court)

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16 (signatures on the following page)

25 ¹ This date would be extended to November 26th, however, that is a Sunday.

26 ² This date would be extended to December 24th, however, that is a Sunday and the following day is a federal holiday.

28 ³ This date would be extended to February 24th, however, that is a Saturday.

1 IT IS SO STIPULATED.

2 PETER GOLDSTEIN LAW CORP

MARQUIS AURBACH COFFING

3 /s/ Peter Goldstein

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6 *Attorneys for Plaintiffs*

/s/ Craig Anderson

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10 /s/ Dan McNutt

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14 IT IS SO ORDERED.

15 
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: August 3, 2023

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